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JAN 9 1999

January 8, 1999

VIA HAND DELIVERY

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Ex Parte Presentation; RM-9108: Billing and Collection Services Provided by
Local Exchange Carriers for Non-Subscribed Interexchange Services

Dear Ms. Salas:

On Thursday, January 7, 1998, Federal TransTel (FTT), represented by Patrick Herold and Karyl A. Sparks, met with Darius Withers and Anita Cheng of the Common Carrier Bureau Enforcement Division. Mr. Herold and Ms. Sparks were accompanied by their counsel, Gary Slaiman and Kristine DeBry of Swidler Berlin Shereff Friedman, LLP.

FTT described that competitive telecommunications providers are in jeopardy of losing their ability to bill for their services on the local exchange carrier ("LEC") bill. Further, FTT argued that as LECs increasingly offer their own services (for example, voice mail, paging, Internet, interexchange) in competition with parties for whom they bill, the LECs will have an increased incentive to deny billing to third parties while promoting their own services. Recent efforts to reduce cramming have had the unintended consequence of encouraging the LECs to restrict billing for competitive services, even those that have not caused cramming problems. FTT argued that the Commission should adopt a rule requiring that a LEC could not discriminate against a competitive provider in billing and collections, while billing its own similar product on the local bill. This requirement should apply to non-subscribed services as suggested by the MCI petition, but also to any other service or product offered by the LEC in competition with other providers.

A copy of a Census Bureau statistical table was distributed. It is enclosed. Also, a copy of the Coalition to Ensure Responsible Billing's comments in CC Docket 98-170 (11/13/98) was presented to Darius Withers.

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Pursuant to Section 1.1206 of the Commission's Rules, one original and one copy of this letter are being filed with your office. If you have any questions regarding this filing, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kristine DeBry".

Kristine DeBry, Esq.

Enclosure

cc: Mr. Darius Withers
Ms. Anita Cheng

No. 823. Usage of General Purpose Credit Cards by Families: 1989 to 1995

[General purpose credit cards include Mastercard, Visa, Optima, and Discover cards. All dollar figures are given in constant 1995 dollars based on consumer price index data as published by U.S. Bureau of Labor Statistics. Families include one-person units; for definition of family, see text, Section 1. Based on Survey of Consumer Finances; see Appendix III. For definition of median, see Guide to Tabular Presentation.]

AGE OF FAMILY HEAD AND FAMILY INCOME	Percent having a general purpose credit card	Median number of cards	Median new charges on last month's bills	Percent having a balance after last month's bills	Median balance ¹	PERCENT OF CARDHOLDING FAMILIES WHO—		
						Almost always pay off the balance	Sometimes pay off the balance	Hardly ever pay off the balance
1989, total	55.8	2	\$100	52.0	\$1,200	53.1	21.5	25.4
1992, total	62.2	2	100	52.8	1,100	52.8	19.6	27.6
1995, total	66.4	2	200	56.3	1,500	51.9	20.4	27.7
Under 35 years old	59.0	2	100	69.2	1,500	40.2	23.5	36.3
35 to 44 years old	68.5	2	200	68.1	1,800	40.7	26.9	32.4
45 to 54 years old	75.4	2	200	64.8	1,800	47.1	22.5	30.4
55 to 64 years old	71.9	2	200	48.0	1,800	59.3	18.4	22.3
65 to 74 years old	68.3	2	200	30.8	800	72.0	12.9	15.1
75 years old and over	54.6	1	100	18.2	700	65.8	2.5	11.7
Less than \$10,000	26.3	1	100	55.8	1,000	56.4	12.4	31.2
\$10,000 to \$24,999	53.3	2	100	57.0	1,500	50.9	17.2	31.9
\$25,000 to \$49,999	75.0	2	100	59.2	1,500	47.8	20.9	31.5
\$50,000 to \$99,999	83.1	2	200	58.4	2,000	48.7	25.3	25.1
\$100,000 and more	97.1	3	800	35.4	2,100	73.7	17.2	9.1

¹ Among families having a balance.

Source: Board of Governors of the Federal Reserve System, unpublished data.

No. 824. Debit Cards—Numbers, Transactions, and Volume, 1990 to 1997, and Projections, 2000

[The complete publication including this copyright table is available from the U.S. Government Printing Office and the National Technical Information Service]

No. 825. Electronic Funds Transfer Volume: 1980 to 1997

[Electronic funds transfer cover automated teller machine (ATM) transactions and transactions at point-of-sale (POS) terminals. Point-of-sale terminals are electronic terminals in retail stores that allow a customer to pay for goods through a direct debit to a customer's account at the bank.]

ITEM	Unit	1980	1985	1990	1992	1993	1994	1995	1996	1997
Total number of transactions	Million ..	(NA)	3,579	5,942	7,537	8,135	8,959	10,464	11,839	12,422
ATM transactions	Million ..	(NA)	3,585	5,751	7,205	7,705	8,334	9,689	10,984	10,980
POS transactions	Million ..	(NA)	14	191	289	430	624	775	1,146	1,442
ATM terminals, total ¹	1,000 ..	18.6	80.0	80.2	87.3	94.8	106.1	122.7	136.1	165.9
Monthly transactions per terminal	Number ..	5,405	4,951	5,980	6,876	6,772	6,459	6,560	6,399	5,545
Shared terminals	1,000 ..	(NA)	36.5	75.3	84.7	92.6	108.1	122.6	136.0	165.0
Proprietary terminals	1,000 ..	(NA)	24.5	4.9	2.6	2.3	1.0	0.1	0.1	(NA)
POS terminals, total ²	1,000 ..	(NA)	(NA)	53	96	155	341	529	675	1,309

NA Not available. ¹ As of September. ² As of June.

Source: Faulstich & Gray, Chicago, IL, *Faulstich & Gray/EFT Network Data Book-1998*, September 28, 1997 (copyright).